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23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA

25 SAN FRANCISCO DIVISION

26 SONOS, INC.,

27 Plaintiff,

28 vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-cv-06754-WHA

Consolidated with Case No. 3:21-cv-07559-WHA

**DECLARATION OF LANA ROBINS IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS OPPOSITION TO
SONOS, INC.'S MOTION FOR
INJUNCTIVE RELIEF AND
ADDITIONAL DAMAGES**

1 I, Lana Robins declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I make this declaration in support of Google’s Administrative
5 Motion to File Under Seal Portions of its Opposition to Sonos, Inc.’s (“Sonos”) Motion for Injunctive
6 Relief and Additional Damages (“Opposition”). I have personal knowledge of the matters set forth in
7 this Declaration, and if called as a witness I would testify competently to those matters.

8 2. Google seeks an order sealing the materials as listed below:

9 Document	Portions to Be Filed Under Seal	Designating Party
10 Declaration of Jocelyn Ma in Support of Google’s Opposition (“Ma Declaration”)	Portions outlined in red boxes	Google
11 Exhibit 2 to the Ma Declaration (“Exhibit 2”)	Portions outlined in red boxes	Google & Sonos

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14 3. The portions of the Ma Declaration outlined in red boxes contain confidential business
15 information regarding Google’s highly sensitive financial and sales data, including the number of
16 units of each accused Google product sold in each fiscal quarter. Public disclosure of this information
17 would harm Google’s competitive standing and create a risk of injury by providing competitors with
18 access to information that Google does not have similar access to about their competitors, allowing
19 them to gain a competitive advantage in the marketplace. If such information were made public, I
20 understand that Google’s competitive standing would be significantly harmed. Google has therefore
21 designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY under the
22 protective order (Dkt. 92). I also understand that this Court has previously granted sealing of the same
23 and/or similar information. *See, e.g.*, Dkt. 334 at 4.

24 4. The portions of Exhibit 2 outlined in red boxes contain confidential business
25 information regarding Google’s products, including non-public information from internal surveys and
26 conjoint studies detailing consumer feedback and market research regarding Google’s smart speakers.
27 Public disclosure of this information would harm the Google’s competitive standing and create a risk
28 of injury by providing competitors with access to information regarding business strategies that

1 Google does not have similar access to about their competitors, allowing them to gain a competitive
2 advantage in the marketplace. If such information were made public, I understand that Google's
3 competitive standing would be significantly harmed. Google has therefore designated this information
4 as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the protective order (Dkt. 92).

5 I declare under penalty of perjury under the laws of the United States of America that to the
6 best of my knowledge the foregoing is true and correct. Executed on June 29, 2023, in Mill Valley,
7 California.

8 DATED: June 29, 2023

9 By: /s/ Lana Robins

10 Lana Robins
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ATTESTATION

I, Sean Pak, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Lana Robins has concurred in the aforementioned filing.

DATED: June 29, 2023

/s/ Sean Pak

Sean Pak